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9 *Attorneys for Plaintiff*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 Tyler Baker, Individually and on behalf
13 of all others similarly situated,

14 Plaintiff,

15 v.

16 Ignite International, LTD.,

17 Defendant.

Case No. 2:20-cv-01172-JCM-DJA

18 **STIPULATION OF DISMISSAL OF**
19 **ACTION WITHOUT PREJUDICE AS TO**
20 **THE NAMED PLAINTIFF AND**
21 **WITHOUT PREJUDICE AS TO THE**
22 **PUTATIVE CLASS**

23 Plaintiff Tyler Baker and Defendant Ignite International, LTD. (“the Parties”)
24 hereby moves to dismiss the above entitled action without prejudice as to the named
25 Plaintiff and without prejudice as to the Putative Class, pursuant to Fed. R. Civ.
26 Procedure 41(a)(1)(ii), each party shall bear his/its own costs. The notice and
27 approval requirements of Federal Rule of Civil Procedure 23(e) are inapplicable to
28 the parties’ settlement and dismissal of this Putative Class action because this action
has not been certified as a class.

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1 WHEREFORE, the Parties respectfully requests that this court dismiss this
2 action without prejudice as to the named Plaintiff, and without prejudice as to the
3 Putative Class.

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5 **KAZEROUNI LAW GROUP, APC**

6 Date: September 1, 2020

By: s/ Gustavo Ponce

7 Gustavo Ponce, Esq.
8 6069 S. Fort Apache Rd., Ste. 100
9 Las Vegas, NV 89148
10 *Attorneys for Plaintiff*

11 **FLANGAS LAW GROUP**

12
13 Date: September 1, 2020

By: s/ Kimberly P. Stein

14 Kimberly P. Stein, Esq.
15 3275 S. Jones Blvd., Ste. 105
16 Las Vegas, NV 89146
17 *Attorneys for Defendant*

18 IT IS SO ORDERED.

19
20 UNITED STATES DISTRICT JUDGE

21 Dated: _____
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on September 1, 2020, the foregoing Stipulation was served via CM/ECF to all parties appearing in this case.

Kazerouni Law Group, APC

By: /s/ Gustavo Ponce
Gustavo Ponce, Esq.
6069 S. Fort Apache Rd., Ste. 100
Las Vegas, NV 89148

